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September 23, 2020

**Via ECF Only**

Hon. Andrew B. Altenburg, Jr.  
United States Bankruptcy Court  
District of New Jersey  
400 Cooper St., 4<sup>th</sup> Floor  
Camden, NJ 08101

RE: Rosa Maria Styles  
Case No. 19-32881-ABA  
Our File No. 30066

Dear Judge Altenburg,

This firm represents Thomas J. Welsh, Jr. ("Welsh"), a creditor in the above-referenced bankruptcy matter. On July 28, 2020, the Court entered an Order lifting the automatic stay as to the real property located at 43 W. 12<sup>th</sup> St., Avalon, New Jersey ("Real Property"). On September 3, 2020, Debtor Rosa Maria Styles ("Debtor") filed a Motion to Reinstate the Stay ("Motion").

The Motion avers that Welsh agreed to take a deed to the Real Property and pay Debtor \$700,000 representing the equity above Welsh's claim. On September 14, 2020, Welsh filed his response to the Motion, certifying that the actual agreement was that he would pay the difference between what he is owed and the value of \$2.9 million, which is far less than \$700,000.

Mr. Welsh has ordered a title report, which to date has not been completed. However, Debtor's Motion to Sell filed in this case and later withdrawn showed multiple judgment liens as well as past due property taxes. Based upon the results of the forthcoming report, the amount Mr. Welsh will pay for the property will be reduced accordingly.

Respectfully submitted,  
SALDUTTI LAW GROUP

/s/ Rebecca K. McDowell  
REBECCA K. MCDOWELL, ESQUIRE

CC: Anthony Sodono, III, Esq., via ECF  
Sari B. Placona, Esq., via ECF  
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